

Mel Camahan, Governor • David A. Shorr, Director

## DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY P.O. Box 176 Jefferson City, MO 65102-0176

MAR 25 1997

Mr. Donald Martin
Environmental Protection Administrator
Hallmark Cards, Inc.
2501 McGee
Box 419580
Mail Drop #220
Kansas City, MO 64141-6580

Dear Mr. Martin:

The Air Pollution Control Program (APCP) has received your March 6, 1997, letter regarding the applicability of Missouri State Rule 10 CSR 10-2.210, "Control of Emissions from Solvent Metal Cleaning." In your letter, you requested an interpretation of whether the use of ethyl acetate to remove waste ink from neoprene (rubber) squeegee blades in a stainless steel wash tank would be subject to the rule.

The APCP does not believe the Solvent Metal Cleaning rule would apply to the situation in question. The rule states in (1)(C) that, "This regulation applies to all processes which use cold cleaners, open-top vapor degreasers or conveyorized degreasers, using nonaqueous solvents to clean and remove soils from metal surfaces." Since Hallmark Cards, Inc. is removing waste ink from neoprene (rubber) squeegee blades, the rule is not applicable.

If you have any questions or comments, you may contact Jennifer Webb at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Roger D. Randolph

Director

RDR: jwp

c: Jeff Creason, Kansas City, Missouri Air Quality Section APCP Policy Manual